

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DR. IRAKLI GLONTI and DAVID DATESHIDZE,

Plaintiffs,

- against -

07 CV 10975 (CM)

LEHMAN BROTHERS, INC. and
RBC DAIN RAUSCHER, INC.

Defendants.

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Geoffrey Valentino, Esq., hereby declares under penalty of perjury:

1. I am a Vice President of defendant Lehman Brothers, Inc., and I submit this declaration in support of Lehman Brothers' motion to stay the claims against it in the Complaint and compel them to arbitration.

2. Annexed hereto as Exhibit A is a true and correct copy of an email dated February 6, 2001 sent by Irakli Glonti to Frank Foerster and written in English regarding a "project with the Chief of Staff of the office of the President of Ghana."

Dated: New York, New York
January 17, 2008


Geoffrey Valentino

Exhibit A

Valentino, Geoffrey

From: Irakli Glonti [ekogl@mail.ru]
Sent: Tuesday, February 06, 2001 1:08 PM
To: Foerster, Frank
Subject: Fw:

----- Original Message -----

From: Irakli Glonti
To: Frank Foerster
Sent: Tuesday, February 06, 2001 8:28 PM

> > Dear Beno,
> Thank you very much for your mail.
> I've read it with attention and I found it very interesting.
> I've already talk about this project with the Chief of Staff of the
> office of the President of Ghana, who has expressed his great concern
> about the issue.
> I have previously obtained appointments with the Ministers of Finance,
> Foreign Affairs and the Governor of Bank of Ghana, in this occasion
> would have been much appreciated if this subject could be introduced
> for their envision.
> Having said this implies, your immediate respons to the below
> suggestions that gives a headway and a clear picture of whatever
> negotiations we are talking about.
> 1- A clear indication through e-mail, a detail info about the general
> condition of the foreseeable relationship that need to be in place in
> Ghana and the Lehman Brothers.
> 2- A letter proving that I am recognized in Lehman Brothers as
> negotiator or similar to the meaning.
> 3- Clearly state the fiscal status of the possible intention so as to
> enable me talk as a credible gentleman as I am well introduced to the
> Ghanaian system. Hence command respect at the authority level.
> 4- In this regards I will want to charge you with an urgent matter of
> answering to this aboved stated issues so that we will be doing the
> right thing that demonstrate what they know me to be in Ghana.
> 5- In case of further information about me and relationship with the
> Government of Ghana, Lehman Brothers can contact:
> A) Mr. Ramadan Assistant of the President of Ghana
> B) Mr. Kwodwo O. MPiani Special Assistant of President
> C) Hon. Hackman Owusu Minister of Foreign Affairs
> D) Etc..
> Let me again congratulate you for all you thought of me and I believe
> it is seen as a investment input as my first positive meeting I had
> just after I received your e-mail.
> I've to go right here and with much regards from a very hot weather in
> sunshine Accra.